

OSBORN LAW P.C.

MEMO ENDORSED

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April 23, 2025

VIA ECF

Honorable Victoria Reznik
United States District Court
Southern District of New York
300 Quarropas Street
White Plains, NY 10601

Re: *Joseph v. Commissioner of Social Security*
Civil Action No. 7:24-cv-08943-KMK-VR

Dear Judge Reznik,

We write on behalf of our client, Cindy Joseph, with the consent of the defense, to request a 21-day extension to file her motion for judgment on the pleadings which is currently due on April 28, 2025, per the Court's January 22, 2025 Order granting Extension of Time. This is the parties' second request for an extension. Plaintiff's counsel needs additional time due to a heavy caseload in the next several weeks, an upcoming trial, and an upcoming Demurrer hearing.

After conferring with the defendant, the parties have agreed to proceed according to the following amended scheduling order, subject to the Court's approval:

- Plaintiff to file her motion for judgment on the pleadings on or before: **May 19, 2025;**
- Defendant to file its response to plaintiff's motion/cross motion on or before: **July 18, 2025;** and
- Plaintiff to file her reply, if any, on or before: **August 1, 2025.**

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Thank you for your consideration of this request.

Respectfully submitted,

s/Daniel A. Osborn
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cc: Kristina Danielle Cohn, Esq. (by ECF)

Plaintiff's request is **GRANTED**, and the proposed briefing dates listed above are adopted.

The Clerk of Court is kindly directed to close the gavel associated with ECF No. 12.

SO ORDERED.


Hon. Victoria Reznik, U.S.M.J.

Dated: 4/24/2025